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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISMAEL ZAMBADA-GARCIA (1),  
aka "El Mayo,"  
aka "Doc,"  
ISMAEL ZAMBADA-IMPERIAL (2),  
aka "Mayito Gordo,"  
aka "Good Guy,"  
ISMAEL ZAMBADA-SICAIROS (3),  
aka "Mayito Flaco,"  
aka "Caballero,"  
IVAN ARCHIVALDO GUZMAN-SALAZAR (4),  
aka "Luis,"  
aka "Chapito,"

Defendants.

Case No. 14CR0658-DMS

I N D I C T M E N T  
(Superseding)

Title 21, U.S.C., Sec. 848(a) and (b) - Continuing Criminal Enterprise; Title 21, U.S.C., Secs. 959, 960, and 963 - Conspiracy to Distribute Methamphetamine, Cocaine and Marijuana Intended for Importation; Title 21, U.S.C., Secs. 952, 960, and 963 - Conspiracy to Import Methamphetamine, Cocaine and Marijuana; Title 18, U.S.C., Secs. 1956(h) and 1956(a)(2)(A) - Conspiracy to Launder Money; Title 21, U.S.C., Sec. 853, Title 18, U.S.C., Sec. 982, and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

Introductory Allegations

1. At all times relevant to this Indictment, there existed a criminal organization known as the "Sinaloa Cartel." The Sinaloa Cartel is a transnational drug trafficking organization based in Sinaloa, Mexico.

2. Under the leadership of defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," the Sinaloa Cartel operates as an

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1 affiliation of drug traffickers and money launderers located in  
2 multiple countries throughout the world who coordinate and pool their  
3 collective resources in order to:

4 a. transport drugs from countries of supply in Asia and  
5 Central and South America to Mexico;

6 b. transport drugs through Mexico and into the United  
7 States;

8 c. distribute drugs to wholesale customers in the United  
9 States; and

10 d. collect, launder, and transfer the proceeds of drug  
11 trafficking.

12 3. At all times relevant to this Indictment, defendant ISMAEL  
13 ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," and members and associates  
14 of the Sinaloa Cartel under him coordinated their drug trafficking  
15 activities to import large quantities of cocaine from Central and  
16 South American countries, including Colombia, Ecuador, Venezuela,  
17 Peru, Panama, Costa Rica, Honduras, and Guatemala, to Mexico, as well  
18 as import large quantities of methamphetamine precursors from Asia to  
19 Mexico. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc,"  
20 and members and associates of the Sinaloa Cartel under him coordinated  
21 the unloading of large shipments of cocaine in Mexico, and coordinated  
22 the transportation and storage of these cocaine shipments within  
23 Mexico. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc,"  
24 and members and associates of the Sinaloa Cartel under him coordinated  
25 their drug trafficking activities to smuggle large quantities of  
26 cocaine, generally in shipments of hundreds of kilograms at a time, as  
27 well as multi-kilogram quantities of methamphetamine and ton-  
28 quantities of marijuana, from Mexico across the United States border,

1 and then into and throughout the United States, including San Diego,  
2 California, and elsewhere.

3 Structure and Organization

4 4. At all times relevant to this Indictment, the roles of the  
5 various Sinaloa Cartel members were as follows:

6 a. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo,"  
7 aka "Doc," was one of the primary leaders of the Sinaloa Cartel.  
8 Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," negotiated  
9 the price for and caused to be obtained large quantities of cocaine  
10 from Central and South American countries to Mexico, and caused multi-  
11 kilogram quantities of cocaine, methamphetamine and marijuana to be  
12 transported from Mexico to the United States border, and then into and  
13 throughout the United States. Defendant ISMAEL ZAMBADA-GARCIA,  
14 aka "El Mayo," aka "Doc," caused drug proceeds to be laundered and  
15 transferred from the United States to Mexico and elsewhere for the  
16 benefit of the Sinaloa Cartel's members and associates.

17 b. Defendant ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"  
18 "Good Guy," the son of defendant ISMAEL ZAMBADA-GARCIA, caused multi-  
19 kilogram quantities of cocaine and ton quantities of marijuana to be  
20 transported from Mexico to the United States border, and then into and  
21 throughout the United States for distribution. Defendant ISMAEL  
22 ZAMBADA-IMPERIAL further caused drug proceeds to be collected from  
23 customers in the United States and laundered and transferred from the  
24 United States to Mexico and elsewhere for the benefit of the Sinaloa  
25 Cartel's members and associates.

26 c. Defendant ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"  
27 "Caballero," the son of defendant ISMAEL ZAMBADA-GARCIA, caused multi-  
28 kilogram quantities of methamphetamine to be transported from Asia to

1 Mexico. Once the methamphetamine arrived in Mexico, defendant ISMAEL  
2 ZAMBADA-SICAIROS caused it to be transported from Mexico to the United  
3 States border, and then into and throughout the United States for  
4 distribution. Defendant ISMAEL ZAMBADA-SICAIROS further caused drug  
5 proceeds to be collected from customers in the United States and  
6 laundered and transferred from the United States to Mexico and  
7 elsewhere for the benefit of the Sinaloa Cartel's members and  
8 associates.

9 d. Defendant IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"  
10 aka "Chapito," caused multi-kilogram quantities of cocaine and ton  
11 quantities of marijuana to be transported from Mexico to the United  
12 States border, and then into and throughout the United States for  
13 distribution. Defendant IVAN ARCHIVALDO GUZMAN-SALAZAR further caused  
14 drug proceeds to be collected from customers in the United States and  
15 laundered and transferred from the United States to Mexico and  
16 elsewhere for the benefit of the Sinaloa Cartel's members and  
17 associates.

18 Purpose and Methodology

19 5. At all times relevant to this Indictment, defendants ISMAEL  
20 ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL,  
21 aka "Mayito Gordo," "Good Guy," ISMAEL ZAMBADA-SICAIROS, aka "Mayito  
22 Flaco," "Caballero," IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"  
23 aka "Chapito," and members and associates of the Sinaloa Cartel under  
24 them pooled their collective resources and used shared networks of  
25 couriers affiliated with the Sinaloa Cartel, to coordinate their  
26 activities to:

27 a. Cause large quantities of cocaine, methamphetamine and  
28 other drugs and drug precursor chemicals to be imported from Asia and

1 Central and South American countries, including Colombia, Ecuador,  
2 Venezuela, Peru, Panama, Costa Rica, Honduras, and Guatemala, to  
3 Mexico, using various means, including cargo aircraft, private  
4 aircraft, submarines and other submersible and semi-submersible  
5 vessels, container ships, supply vessels, go-fast boats, fishing  
6 vessels, buses, rail cars, tractor trailers, trucks, automobiles, and  
7 private and commercial interstate and foreign carriers. After the  
8 drugs and drug precursor chemicals arrived in Mexico, the conspirators  
9 used shared resources to unload and store the drugs in Mexico.

10           b. Cause large quantities of cocaine, methamphetamine and  
11 marijuana, at times in shipments of hundreds of kilograms at a time,  
12 to be transported from various locations in Mexico to the United  
13 States border where the drugs were then stored in multiple warehouses,  
14 stash houses, and safe houses located in the areas of Tijuana,  
15 Mexicali, and elsewhere.

16           c. Cause drugs to be smuggled across the United States-  
17 Mexico border through the Southern District of California and  
18 elsewhere using multiple means, including automobiles, tractor  
19 trailers, trucks, fishing vessels and tunnels.

20           d. Cause drugs to be unloaded by stash house operators  
21 affiliated with the Sinaloa Cartel, and stored at multiple stash  
22 houses, safe houses, and warehouse locations in the Southern District  
23 of California and elsewhere.

24           e. Cause cocaine, methamphetamine and marijuana to be  
25 transported throughout the United States, using various means,  
26 including automobiles, tractor trailers, trucks, and private and  
27 commercial interstate carriers.

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1 f. Cause cocaine, methamphetamine and marijuana to be sold  
2 and distributed to wholesale customers in the greater Los Angeles,  
3 California area; the greater Chicago, Illinois area, and elsewhere.

4 g. Cause drugs proceeds to be collected from customers,  
5 counted, packaged, and transferred and laundered from the United  
6 States through the Southern District of California, and elsewhere, to  
7 Mexico, and elsewhere, using multiple means, including bulk cash  
8 smuggling, structured bank deposits, wire transfers, currency exchange  
9 transfers, alternative credit-based systems used to transfer money  
10 without the use of wires or other traditional means, goods-based  
11 systems in which items, including high-end luxury vehicles and  
12 airplanes, were purchased in one location and transferred to another  
13 location, and other methods by shared networks of money couriers and  
14 money launderers associated with the Sinaloa Cartel.

15 h. Use various means to communicate with each other in  
16 order to coordinate their drug trafficking activities, including  
17 cellular telephones, satellite telephones, computers, instant  
18 messaging applications on smart phones, and email accounts.

19 i. Use coded language and other means to misrepresent,  
20 conceal and hide, and to cause to be misrepresented, concealed and  
21 hidden, the drug trafficking activities of the Sinaloa Cartel, and to  
22 avoid detection and apprehension by law enforcement authorities.

23 j. Use various means to evade law enforcement and protect  
24 their drug distribution activities, including: obtaining guns and  
25 other weapons; bribing corrupt public officials; engaging in violence  
26 and threats of violence; and intimidating with threats of violence  
27 members of law enforcement, rival drug traffickers, and members of  
28 their own drug trafficking organization.

Count 1

1  
2 1. Paragraphs one through five of the Introductory Allegations  
3 of this Indictment are realleged and incorporated by reference as  
4 though fully set forth herein.

5 2. Beginning no later than in or about May 2005 and continuing  
6 up to and including July 25, 2014, within the Southern District of  
7 California, and elsewhere, defendant ISMAEL ZAMBADA-GARCIA, aka "El  
8 Mayo," aka "Doc," did knowingly and intentionally engage in a  
9 continuing criminal enterprise by violating various felony provisions  
10 of the Controlled Substances Act (Title 21, United States Code,  
11 Sections 801, et seq.), including but not limited to Title 21, United  
12 States Code, Sections 959, 960 and 963, as alleged in Count 2, and  
13 Sections 952, 960 and 963, as alleged in Count 3, which violations  
14 were part of a continuing series of violations of said Act and were  
15 undertaken by defendant in concert with five or more other person with  
16 respect to whom defendant occupied a position of organizer, supervisor  
17 and other position of management, and from which such continuing  
18 series of violations defendant obtained substantial income and  
19 resources.

20 3. Furthermore, defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo,"  
21 aka "Doc," was a principal administrator, organizer, supervisor and  
22 leader of the criminal enterprise, which involved a conspiracy to  
23 distribute 150 kilograms and more of cocaine, a Schedule II Controlled  
24 Substance, for the purpose of unlawful importation into the United  
25 States, and a conspiracy to import 150 kilograms and more of cocaine,  
26 a Schedule II Controlled Substance, into the United States from a  
27 place outside thereof.

28 All in violation of Title 21, U.S.C., Section 848(a) and (b).

1 Count 2

2 Beginning no later than in or about May 2005 and continuing up to  
3 and including July 25, 2014, defendants ISMAEL ZAMBADA-GARCIA, aka "El  
4 Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"  
5 aka "Good Guy," ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"  
6 aka "Caballero," and IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"  
7 aka "Chapito," did knowingly and intentionally conspire with each  
8 other, and with other persons known and unknown to the grand jury, to  
9 distribute 500 grams and more of a mixture and substance containing a  
10 detectable amount of methamphetamine and 5 kilograms and more of  
11 cocaine, both Schedule II Controlled Substances; and 1000 kilograms  
12 and more of marijuana; a Schedule I Controlled Substance; for the  
13 purpose of unlawful importation into the United States; all in  
14 violation of Title 21, United States Code, Sections 959, 960, and 963.

15 Count 3

16 Beginning no later than in or about May 2005 and continuing up to  
17 and including July 25, 2014, within the Southern District of  
18 California, and elsewhere, defendants ISMAEL ZAMBADA-GARCIA, aka "El  
19 Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"  
20 aka "Good Guy," ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"  
21 aka "Caballero," and IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"  
22 aka "Chapito," did knowingly and intentionally conspire with each  
23 other, and with other persons known and unknown to the grand jury, to  
24 import 500 grams and more of a mixture and substance containing a  
25 detectable amount of methamphetamine and 5 kilograms and more of  
26 cocaine, both Schedule II Controlled Substances; and 1000 kilograms  
27 and more of marijuana; a Schedule I Controlled Substance; into the

28



1 United States from a place outside thereof; all in violation of Title  
2 21, United States Code, Sections 952, 960, and 963.

3 Count 4

4 Beginning no later than in or about May 2005 and continuing up to  
5 and including July 25, 2014, within the Southern District of  
6 California and elsewhere, defendants ISMAEL ZAMBADA-GARCIA, aka "El  
7 Mayo," aka "Doc," and IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"  
8 aka "Chapito," did knowingly and intentionally conspire with each  
9 other, and with other persons known and unknown to the grand jury, to  
10 commit offenses against the United States under Title 18, United  
11 States Code, Section 1956, namely: transport, transmit and transfer  
12 monetary instruments and funds, that is United States currency, from a  
13 place in the United States to and through a place outside the United  
14 States, with the intent to promote the carrying on of specified  
15 unlawful activity, that is the distribution of controlled substances,  
16 in violation of Title 18, United States Code, Section 1956(a)(2)(A);  
17 all in violation of Title 18, United States Code, Section 1956(h).

18 FORFEITURE ALLEGATIONS

19 1. The allegations contained in Counts 1 through 4 of this  
20 Indictment are realleged and by reference fully incorporated herein  
21 for the purpose of alleging forfeiture to the United States of America  
22 pursuant to the provisions of Title 21, United States Code,  
23 Section 853, and Title 18, United States Code, Section 982.

24 2. As a result of the commission of the felony offenses alleged  
25 in Counts 1 through 3 of this Indictment, said violations being  
26 punishable by imprisonment for more than one year and pursuant to  
27 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),  
28 defendants ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," ISMAEL

1 ZAMBADA-IMPERIAL, aka "Mayito Gordo," aka "Good Guy," ISMAEL ZAMBADA-  
2 SICAIROS, aka "Mayito Flaco," aka "Caballero," and IVAN ARCHIVALDO  
3 GUZMAN-SALAZAR, aka "Luis," aka "Chapito," shall, upon conviction,  
4 forfeit to the United States all their rights, title and interest in  
5 any and all property constituting, or derived from, any proceeds any  
6 defendant obtained, directly or indirectly, as the result of the  
7 felony offense alleged in this Indictment, and any and all property  
8 used or intended to be used in any manner or part to commit and to  
9 facilitate the commission of the violation alleged in this indictment.  
10 The property to be forfeited includes, but is not limited to, the  
11 following: 1982 Cessna Turbo 210 bearing Serial #21064675, United  
12 States tail number N1218U and Mexican tail number XB-NKY; 2006  
13 Mercedes SLR McLaren bearing VIN #WDDAJ76F66M000890; 2014 Nissan  
14 GTR bearing VIN #JN1AR5EF4EM270727; 2010 Lamborghini Murcielago  
15 bearing VIN #ZHWBU8AHXALA03904 and 2008 Lamborghini bearing  
16 VIN #ZHWBU37S58LA02742.

17 3. As a result of the commission of the felony offense alleged  
18 in Count 4 of this Indictment, said violation being punishable by  
19 imprisonment for more than one year, and pursuant to Title 18, United  
20 States Code, Section 982(a)(1), defendants ISMAEL ZAMBADA-GARCIA,  
21 aka "El Mayo," aka "Doc," and IVAN ARCHIVALDO GUZMAN-SALAZAR,  
22 aka "Luis," aka "Chapito," shall, upon conviction, forfeit to the  
23 United States all rights, title and interest in any and all property  
24 involved in such offense, and any property traceable to such property.

25 4. If any of the above-described forfeitable property, as a  
26 result of any act or omission of the defendants:

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- 1 a. cannot be located upon the exercise of due diligence;
- 2 b. has been transferred or sold to, or deposited with, a
- 3 third party;
- 4 c. has been placed beyond the jurisdiction of the Court;
- 5 d. has been substantially diminished in value; or
- 6 e. has been commingled with other property which cannot be
- 7 subdivided without difficulty;

8 it is the intent of the United States, pursuant to Title 21,  
 9 United States Code, Section 853(p), as to Counts 1 through 3, and  
 10 Title 21, United States Code, Section 853(p), as incorporated by  
 11 Title 18, United States Code, Section 982(b)(1) as to Count 4, to seek  
 12 forfeiture of any other property of the defendant up to the value of  
 13 the said property listed above as being subject to forfeiture.

14 All in violation of Title 21, United States Code, Section 853,  
 15 Title 18, United States Code, Section 982, and Title 28, United States  
 16 Code, Section 2461(c).

17 DATED: July 25, 2014.

18 A TRUE BILL:

19   
 20 \_\_\_\_\_  
 21 Foreperson

21 LAURA E. DUFFY  
 22 United States Attorney

23 By:   
 24 \_\_\_\_\_  
 25 ADAM L. BRAVERMAN  
 26 Assistant U.S. Attorney